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As described in the Specification, the cable structures according to the present invention exclude "loose tube" structures, i.e., rigid tube structures containing optical fibers that are free to move inside the rigid tubes. See Specification at page 3, lines 14-27. Rather, the present invention proposes an optical fiber cable structure based on a central reinforcing element to which bare optical fibers are directly coupled mechanically by contact. Further, this structure is set to be "tight" since the optical fibers are not free to move to accommodate longitudinal variations in the dimensions of the cable, since they are mechanically coupled to the central reinforcing element by being in contact therewith. See Specification at page 3, lines 31-35.

In contrast, the optical fiber according to Quinn is a "loose tube" type structure. In this regard, Applicant notes that Figure 5 depicts each buffer tube 14 as containing a plurality of fibers. Further, Quinn teaches that these buffer tubes are stranded along a central strength member 18. See Quinn at column 5, lines 35-53. Moreover, as the optical fibers are contained within buffer tubes 14, Quinn clearly fails to teach a buffer layer which presses the bare optical fibers into contact against the central reinforcing element to couple them mechanically to the central reinforcing element. Additionally, the buffer tube structure of the Quinn cable is discussed in the Specification, in which the movement of the optical fibers which occurs within the buffer tubes if bare fibers are not mechanically coupled to the central reinforcing element is described. See Specification at page 2, line 22 - page 3, line 13.

In contrast, the optical fiber cable defined by claims 1, 2 and 16 provide <u>direct</u>

mechanical coupling between the <u>bare</u> optical fibers and the central reinforcing element to enable
the central reinforcing element to assist the optical fibers in better accommodating variations in

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the longitudinal dimensions of the cable. See Specification at page 7, lines 16-31. Further, the

mechanical coupling provides adequate pressure between the bare optical fiber and the central

reinforcing element such that the contraction and extension behavior of the cable is comparable

to that of the bare optical fiber alone, which is clearly not provided in the "loose tube" cable

structure of Quinn which lacks this mechanical coupling. See Specification at page 5, line 36 -

page 6, line 10.

Thus, Quinn clearly fails to anticipate all the limitations of claims 1, 2 and 16 at least

because Quinn cannot properly be interpreted to teach the claimed mechanical coupling of the

bare optical fibers. Accordingly, the rejection of claims 1, 2 and 16 is improper, and

reconsideration and withdrawal of the rejection is requested.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

SUGHRUE MION, PLLC

Telephone: (202) 293-7060 Facsimile: (202) 293-7860

WASHINGTON OFFICE 23373
CUSTOMER NUMBER

Date: August 17, 2005

Brian K. Shelton

Registration No. 50,245